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MATTER NO.

296-001

February 18, 2023

VIA CM/ECF

Hon. Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

RE: Flynn v. Cable News Network, Inc.
Case 1:21-cv-02587 (GHW/SLC)

Dear Judge Cave:

I represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter.

Pursuant to Federal Rule of Civil Procedure 5.2(e) and 26(c) and Your Honor’s Individual Practice Rule 1.G, I respectfully request leave to file under seal the unredacted version of my Response to CNN’s letter-motion [*ECF No. 109*] given that the document contains material that has been designated by Plaintiffs as “Highly Confidential” pursuant to the March 15, 2022 Confidentiality Stipulation and Protective Order [*ECF No. 60*].

I apologize that I did not seek leave to file the Response under seal before filing. I want to cure this problem pursuant to Your Honor’s February 17, 2023 Order.

Yours very truly,

/s/ *Steven S. Biss*

Steven S. Biss

cc. Anthony C. Carlini, Jr., Esq.

Plaintiffs' letter-motion seeking leave to file under seal the unredacted version of their response to Defendant's February 9, 2023 letter (the "Unredacted Response") (ECF No. 118) is GRANTED. Plaintiffs are directed to **promptly** file the Unredacted Response, in accordance with the Court's order dated February 17, 2023. (ECF No. 116).

The Clerk of Court is respectfully directed to close ECF No. 118.

SO ORDERED 02/19/23


SARAH L. CAVE
United States Magistrate Judge